

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Petition by Midwest Wireless Iowa, L.L.C.)	
for Commission Agreement in Redefining)	
the Service Areas of Rural Telephone Companies)	
in the State of Iowa Pursuant to)	
47 C.F.R. Section 54.207(c))	DA 05-3252

Comments of Iowa RSAs 7, 8 & 10

COMES NOW, RSA 7 Limited Partnership, Iowa 8 - Monona Limited Partnership and Iowa RSA 10 General Partnership (Iowa RSAs 7, 8 & 10) in response to the Petition filed by Midwest Wireless Iowa, L.L.C. on December 12, 2005, (Midwest Petition) in the captioned proceeding and submits these comments in support of the goals of the Midwest Petition. ¹

Iowa RSAs 7, 8 & 10 are wireless licensees in rural service areas of Iowa. The Midwest Petition addresses many of the unique issues faced by wireless carriers in Iowa. Iowa RSAs 7, 8 & 10 support the Midwest Petition's findings that the Iowa Utilities Board was very thorough and fully considered affected parties when determining service areas for wireless carriers. The State of Iowa properly analyzed and decided upon service areas for wireless carriers seeking to be treated as Eligible Telecommunications Carriers (ETCs).

¹ See *In the Matter of Federal-State Joint Board on Universal Service, Petition by Midwest Wireless Iowa, L.L.C. for Commission Agreement in Redefining the Service Areas of Rural Telephone Companies in the State of Iowa Pursuant to 47 C.F.R. Section 54.207(c)*, CC Docket No. 96-45, Petition of Midwest Wireless Iowa, LLC, Dec. 12, 2005; see also *In the Matter of Federal-State Joint Board on Universal Service* CC Docket No. 96-45, Public Notice, DA 05-3252 (WCB Dec. 21, 2005).

The Midwest Petition is correct in its assertion that their requested redefinition is consistent with Federal Universal Service policy and that it satisfies the three Joint Board factors under Section 54.207(c)(1). The record at the state level supports that the Iowa Utilities Board completely considered federal policy as it applies to rural Iowa as part of its administrative decision making. Indeed, particular issues such as cream skimming were specifically addressed by the state's decision as well as in state board member submissions referred to by the Midwest Petition. The state was cognizant of the requirements for ETCs and the state conducted the requisite analysis and reached a well considered decision.

Iowa RSAs 7, 8 & 10 note that the Midwest Petition is a unique instance in which the state designated the petitioners as ETCs prior to the issuance of the final statewide rule for wireless service areas. However, the subject matter expertise which the state applied to these matters involving Iowa carriers is prevalent throughout both the final rules of the state and the specific decision for the wireless carrier.

Having shown good cause for the grant of its Petition and having outlined the properly considered state level decisions which comply with federal requisites, Iowa RSAs 7, 8 & 10 support the goals of the Midwest Petition and submit that the same should be granted.

Respectfully submitted,
RSA 7 LIMITED PARTNERSHIP
IOWA 8 - MONONA LIMITED PARTNERSHIP
IOWA RSA 10 GENERAL PARTNERSHIP

Dated: January 5, 2006

Michael G. Kulik
Robert F. Holz, Jr.
Davis, Brown, Koehn, Shors & Roberts, P.C.
666 Walnut Street, Suite 2500
Des Moines, Iowa 50309

By /s/ Raymond J. Quianzon
Raymond J. Quianzon
Fletcher, Heald & Hildreth PLC
1300 N. 17th Street, 11th Floor
Arlington, Virginia 22209-3801